

Exhibit 2

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	(Jointly Administered)
Debtors.	:	
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DECLARATION OF MICHAEL YAKIMA

I, Michael Yakima, hereby declare under the penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my knowledge, information and belief.

1. I am currently employed as a product manager for R. L. Polk & Co., recently acquired by IHS Global, Inc. (hereinafter referred to as "Polk"). Prior to my current position, I was a PolkInsight Advisor assigned to the General Motors ("GM") account, and I maintained an office at GM's Headquarters in The Renaissance Center in Detroit, Michigan. I have been employed by Polk for approximately ten years. Unless otherwise stated, all of the information contained herein is based on my personal knowledge, or the review of information contained within Polk's books and records.

2. Polk compiles and maintains a proprietary database of motor vehicle registrations, which includes registration transfers and renewals throughout the United States ("Polk Database").

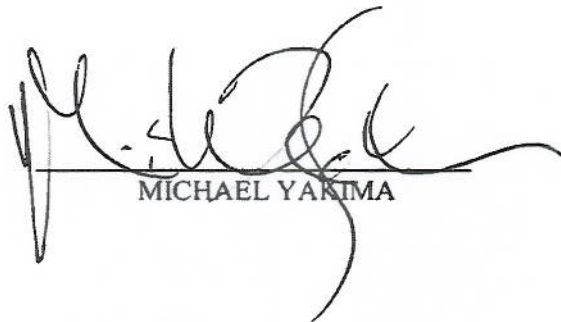
3. In 2009, one of my job responsibilities, pursuant to a service contract which existed between Polk and General Motors Corporation (n/k/a Motors Liquidation Company) ("Old GM"), was to serve as an on-site advisor to Old GM to act as the primary Polk point-

person to provide assistance with reporting (including the provision of supporting information for such), application usage and analysis of the Polk system from which Old GM would use to pull statistical analyses of automotive information. The total number of Old GM manufactured vehicles that were in operation in the United States was among the information provided to Old GM. This data is sometimes referred to as "vehicles in operation" or "VIO". Polk assembles VIO information from various sources, including the information from the Polk Database. Polk provides the VIO information to various vehicle manufactures and this data is routinely relied on in the automotive industry for a variety of business purposes.

4. Under Polk's arrangement with Old GM, Polk provided Old GM (and then General Motors LLC ("New GM") after it acquired substantially all of the assets of Old GM in July 2010) with the VIO information for GM manufactured vehicles on a quarterly basis.

5. Attached hereto as Exhibit "A" is a true and accurate copy of a spreadsheet I provided to Old GM in early July 2009 which shows the total number of Old GM manufactured vehicles in operation in the United States in the second quarter of 2009 (ending June 30 2009). There were a total of 70,535,565 Old GM manufactured vehicles in operation in the United States as of that date.

Dated: August 27, 2014



MICHAEL YAKIMA

Exhibit A

Sum of Vehicle Count SUM	
Make	Total
BUICK	6695230
CADILLAC	3652036
CHEVROLET	36901522
GM ELECTRIC	591
GMC	7289793
HUMMER	241745
ISUZU	214
OLDSMOBILE	4086499
OTHER - ISUZU	192012
PONTIAC	7575672
SAAB	565749
SATURN	3330156
TRANS MFG CORP	4346
Grand Total	70535565